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6 Attorneys for Plaintiff
7 8 VINI INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 8 VINI INC., a California corporation,
12 Plaintiff,
13 v.
14 DSV AIR & SEA INC., a New Jersey
corporation,
15 Defendant.
16

Case No. 3:20-cv-09309-JCS

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: September 10, 2021
Time: 2:00 p.m.
Crtrm.: F, 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102
Judge: Honorable Joseph C. Spero

Pursuant to the Court's Order Continuing Further Case Management Conference (ECF No. 24, May 24, 2021) Defendant DSV Air & Sea, Inc. ("Defendant") and Plaintiff 8 Vini, Inc. ("Plaintiff") hereby submit the following Further Joint Case Management Conference Statement and Stipulation to Continue:

Further Joint Case Management Statement

Most of the information set forth in the parties' initial Joint Case Management Conference Statement (ECF No. 19) and prior Further Joint Case Management Conference Statement (ECF No. 23) remains the same. The parties offer supplemental information and updates corresponding to the following numbered paragraphs in that Statement and the Court's Standing Order regarding the contents of such statements (ECF No. 6-2):

8. Discovery: On March 3, 2021, Plaintiff propounded a first round of interrogatories and requests for production of documents. After obtaining several extensions, Defendant on June 2 served partial responses without producing any documents but has promised to supplement and is assembling documents to produce by July 2, 2021.

12. Settlement and ADR: Plaintiff made a settlement offer in January 2021 but has yet to receive a response. Plaintiff has given Defendant as significant amount of information to review. A substantial liability analysis has been prepared to assist Defendant in evaluating its potential liability to Plaintiff and inform its settlement position. Defendant has experienced a significant delay in making that evaluation due to personnel issues. Although counsel hope to actively engage in settlement discussions and are hopeful they may be able to resolve the matter informally, Plaintiff has become skeptical and intends to proceed with depositions.

Dated: September 7, 2021

DONAHUE FITZGERALD LLP

By: /s/ John C. Kirke

John C. Kirke
Attorney for Plaintiff
8 VINI, INC.

1 Dated: September 7, 2021

2 COX, WOOTTON, LERNER, GRIFFIN & HANSEN,
3 LLP

4 By: /s/ Arthur A. Severance

5 Arthur A. Severance
6 Attorney for Defendant
7 DSV AIR & SEA, INC.
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